

**APPENDIX F**

**DISCOVERY PLAN WORKSHEET**

**Tier I Pre-Settlement Discovery**

Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations:

11/4/19

Completion date for Phase I Discovery  
as agreed upon by the parties:

11/14/19

*(Reciprocal and agreed upon document production,  
generally not including depositions, unless otherwise agreed.  
No more than 30 days after Initial Conference)*

Status conference TBD by the court:  
*(Generally 15 days post Tier I Discovery)*

11/11/19

**Tier II Discovery and Motion Practice**

Motion to join new parties or amend the pleadings:  
*(Presumptively 15 days post status conference)*

11/18/19

First requests for production of documents  
and for interrogatories due by:  
*(Presumptively 15 days post joining/amending )*

12/3/19

All fact discovery completed by:  
*(Presumptively 3.5 months post first  
requests for documents/interrogatories )*

3/11/20

Exchange of expert reports completed by:  
*(Presumptively 30 days post fact discovery)*

4/1/20

Expert depositions completed by:  
*(Presumptively 30 days post expert reports)*

5/1/20

Final date to take first step in dispositive motion practice:  
*(Parties are directed to consult the District Judge's  
individual rules regarding such motion practice.  
Presumptively 30 days post expert depositions)*

5/1/20

**COMPLETION OF ALL DISCOVERY BY:**

*(Note: Presumptively 9 months after Initial Conference.)*

6/18/20

Submission of joint pre-trial order:

8/1/20

Final Pre-Trial Conference TBD by the court:

8/10/20